## EL PASO FIELD SERVICES LI PROBUETION PUT CLOSURE

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CULLINS FED #4 Meter/Line ID - 92010 DECEIVED

SITE DETAILS

Sec: 04

Unit: M

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Land Type: 2 - Federal Pit Closure Date: 10/12/94

NMOCD Hazard Ranking: 40 Operator: MERIDIAN OIL INC

Legals - Twn: 24 - - Rng: 03

#### **RATIONALE FOR RISK-BASED CLOSURE:**

The above mentioned production pit was assessed and ranked according to the criteria in the New Mexico Conservation Division's Unlined Surface Impoundment Closure Guidelines.

The primary source, discharge to the pit, has been removed. There has been no discharge to the production pit for at least five years and the pit has been closed for at least three years.

The production pit has been remediated to the practical extent of the trackhoe or to the top of bedrock. Initial laboratory analysis has indicated that the soil remaining at the bottom of the excavation is above standards based on the hazard ranking score. Contaminated soil was removed and transported to an approved landfarm for disposal. The initial excavation was backfilled with clean soil and graded in a manner to divert precipitation away from the excavated area. Any rainfall that does infiltrate the ground surface must migrate through clean backfill before reaching any residual hydrocarbons remaining in the soil. Therefore, further mobility of residual hydrocarbons is unlikely.

Since the soil samples from the initial excavation were above standards, a test boring was drilled and a sample was collected to evaluate the vertical extent of impact to soils. Test boring sample results indicated soils below standards beneath the original excavation.

El Paso Field Services Company (EPFS) requests closure of the above mentioned production pit location for the following reasons:

- Discharge to the pit has not occurred in over five years and the pit has been closed for over three years.
- The bulk of the impacted soil was removed during the initial excavation.
- The excavation was backfilled with clean soil and graded to divert precipitation away from the excavation area.
- All source material has been removed from the ground surface, eliminating potential direct contact with livestock and the general public.
- Groundwater was not encountered in the initial excavation or test boring: therefore, impact to groundwater is unlikely.
- Soil samples collected beneath the initial excavation were below standards.
- No potential receptors are within 1,000 feet of the site.
- Residual hydrocarbons remaining in the soil at the bottom of the initial excavation will naturally degrade in time with minimal risk to the environment.

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## FIELD PIT SITE ASSESSMENT FORM

GENERAL	Meter: 92010 Location: Culting Feb. No. 4  Operator #: 2999 Operator Name: MDI P/L District: O51TO  Coordinates: Letter: M Section 4 Township: 24 Range: 3  Or Latitude Longitude  Pit Type: Dehydrator Location Drip: Line Drip: Other:  Site Assessment Date: Area: 8 Run: 83
	NMOCD Zone:         Land Type:         BLM         ∅ (1)           (From NMOCD         State         □ (2)           Maps)         Inside         □ (1)         Fee         □ (3)           Outside         □ (2)         Indian         □           Depth to Groundwater         Less Than 50 Feet (20 points)         ☒ (1)
	50 Ft to 99 Ft (10 points) (2) Greater Than 100 Ft (0 points) (3)
ASSESSMENT	Wellhead Protection Area:  Is it less than 1000 ft from wells, springs, or other sources of fresh water extraction?, or; Is it less than 200 ft from a private domestic water source? (1) YES (20 points) (2) NO (0 points)
SITE ASS	Horizontal Distance to Surface Water Body Less Than 200 Ft (20 points) (1) 200 Ft to 1000 Ft (10 points) (2) Greater Than 1000 Ft (0 points) (3) Name of Surface Water Body
	(Surface Water Body: Perennial Rivers,Major Wash,Streams,Creeks, Irrigation Canals,Ditches,Lakes,Ponds) Distance to Nearest Ephemeral Stream ☐ (1) < 100'(Navajo Pits Only) ☐ (2) > 100'
	TOTAL HAZARD RANKING SCORE: 40 POINTS
RKS	Remarks: Redline Book - Inside Vulnerable Zone Topo - Inside
REMARKS	2 pits. Will closel. Pi+has small amount of liquid in 1t
RE	DI 64 HAVI (SP3190) 04/08/94

# PHASE I EXCAVATION

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## FLLD PIT REMEDIATION/CLOSURE FORM

GENERAL	Meter: 9200 Location: Collins Fed No. 4  Coordinates: Letter: M Section 4 Township: 24 Range: 3  Or Latitude Longitude  Date Started: 10/2/94 Run: 08 83
FIELD OBSERVATIONS	Sample Number(s): KD 333  Sample Depth: 6' Feet  Final PID Reading 450 pm PID Reading Depth 6' Feet  Yes No  Groundwater Encountered  Approximate Depth Feet
CLOSURE	Remediation Method:  Excavation  Onsite Bioremediation  Backfill Pit Without Excavation  Soil Disposition:  Envirotech  Other Facility  Name:  Pit Closure Date: 10/12/94  Pit Closed By: BEL
REMARKS	Remarks: Excavated pit to 6', Hit Sandstore, Took pio Sample, Closed pit.  Signature of Specialist: My Jem
لــــا	(SP3191) 03/16/94

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## FIELD SERVICES LABORATORY ANALYTICAL REPORT

## PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

### SAMPLE IDENTIFICATION

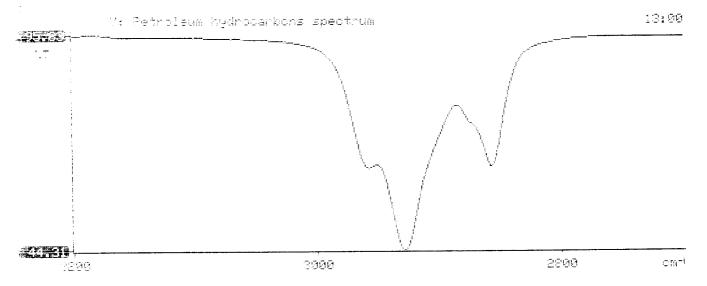
	Field ID	Lab ID
SAMPLE NUMBER:	KD 333	946410
MTR CODE   SITE NAME:	92010	N/A
SAMPLE DATE   TIME (Hrs):	10-12-94	0845
SAMPLED BY:		N/A
DATE OF TPH EXT.   ANAL.:	10-17-94	10-17-94
DATE OF BTEX EXT.   ANAL.:	10-19.94	1 10-21-94
TYPE   DESCRIPTION:	V C	Brown frey sand telay
, <u></u>		
REMARKS:		
	DECLUTO	

#### **RESULTS**

PARAMETER	RESULT	UNITS	QUALIFIERS			
			DF	Q	M(g)	V(ml)
BENZENE	40.5	MG/KG	20			
TOLUENE	5.5	MG/KG	20_			
ETHYL BENZENE	3.2	MG/KG	20			
TOTAL XYLENES	76	MG/KG	20			
TOTAL BTEX	85.2	MG/KG				
TPH (418.1)	26500	MG/KG			0.20	28
HEADSPACE PID	450	PPM				
PERCENT SOLIDS	88.9	%				

TPH is by EPA Method	d 418.1 and BTEX is by EPA Method 8020
The Surrogate Recovery was at 121	_% for this sample All QA/QC was acceptable.
Narrative:	ale Recovery outside ATI DC Irmits
due to makin interferen	iu ,
DF = Dilution Factor Used	
Approved By:	Date: /b/3/4/

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ATI I.D. 410405

October 26, 1994

El Paso Natural Gas Company P.O. Box 4990 Farmington, NM 87499

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On 10/18/94, Analytical Technologies, Inc., (ADHS License No. AZ0015), received a request to analyze non-aqueous samples. The samples were analyzed with EPA methodology or equivalent methods. The results of these analyses and the quality control data, which follow each set of analyses, are enclosed.

If you have any questions or comments, please do not hesitate to contact us at (505) 344-3777.

Letitia Krakowski, Ph.D.

Project Manager

MR:jt

Enclosure

H. Mitchell Rubenstein, Ph.D. Laboratory Manager





#### GAS CHROMATOGRAPHY RESULTS

TEST : BTEX (EPA 8020)

CLIENT : EL PASO NATURAL GAS CO. ATI I.D.: 410405

PROJECT # : 24324

PROJECT NAME : PIT CLOSURE

SAMPL ID. #		MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
19	946410	NON-AQ	10/12/94	10/19/94	10/21/94	20
20	946411	NON-AQ	10/12/94	10/19/94	10/20/94	1
21	946412	NON-AQ	10/12/94	10/19/94	10/21/94	20
PARAM	METER		UNITS	19	20	21
BENZE	ENE		MG/KG	<0.5	<0.025	6.7
TOLUE	ENE		MG/KG	5.5	<0.025	89
ETHYI	LBENZENE		MG/KG	3.2	<0.025	11
TOTAL	L XYLENES	٠.	MG/KG	76	<0.025	110
SURRO	OGATE:					
BROMO	OFLUOROBENZENE (%)	)		121*	97	99

<sup>\*</sup>OUTSIDE ATI QUALITY CONTROL LIMITS DUE TO MATRIX INTERFERENCE

# PHASE II

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#### RECORD OF SUBSURFACE EXPLORATION PHILIP ENVIRONMENTAL 4000 Monroe Road EPNG PITS Farmington, New Mexico 87401 Project Name Phase (606) 326-2262 FAX (606) 326-2388 Project Number Project Location Elevation Well Logged By **Borehole Location** Personnel On-Site GWL Depth Contractors On-Site Logged By Client Personnel On-Site Drilled By 5/25/95-0816 **Drilling Method** Date/Time Started Date/Time Completed 5/21/95 - 0945 Air Monitoring Method Depth Sample USCS Depth Туре & Sample Description Lithology Air Monigoging **Drilling Conditions** Unite: NDO S Symbol Change & Blow Counts Classification System: USCS (Feet) Numbe Hs (inches (feet) ВН Backfill to b 0 Gry silty Clay, med stiff, med plastic 20 200 -0827 hr ٥ 10 j 10-17 H Br silry SAND, VF-F Sand, loose, 0 2 15-17 בנצט ב 15 0 -0855 s" AA 7047 20 3 TOB 20' 25 30 35 40

Comments: 20-12' Sample Submitted to Lab (RTEX, TPH) CM(24)

Geologist Signature



### FIELD SERVICES LABORATORY ANALYTICAL REPORT

## PIT CLOSURE PROJECT - Soil Samples Inside the GWV Zone

#### **SAMPLE IDENTIFICATION**

	Field ID	Lab ID
SAMPLE NUMBER:	cmc24	946835
MTR CODE   SITE NAME:	92010	N/A
SAMPLE DATE   TIME (Hrs):	5-25-95	<i>0</i> 85 <i>5</i>
SAMPLED BY:		N/A
DATE OF TPH EXT.   ANAL.:	5-30-95	5.30-95
ATE OF BTEX EXT.   ANAL.:	6-1-95	6-295
TYPE   DESCRIPTION:	VG	Light Drown sand
REMARKS:		'

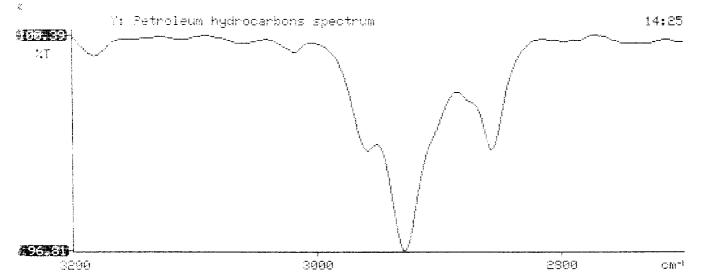
#### RESULTS

PARAMETER	RESULT	UNITS	QUALIFIER		RS	RS	
			DF	Q	M(g)	V(ml)	
BENZENE	< 0.025	MG/KG	1				
TOLUENE	20.029	MG/KG					
ETHYL BENZENE	۷٥.025	MG/KG		<u></u>			
TOTAL XYLENES	40.025	MG/KG	,				
TOTAL BTEX	۷٥.١٥	MG/KG					
TPH (418.1)	41.8 42 5 145	MG/KG			2.02	28	
HEADSPACE PID	10	PPM					
PERCENT SOLIDS	93.9	%		X.	11. The state of t		

TPH is by EPA Method 418.1 and BTEX is by EPA Method 8020					
The Surrogate Recovery was at  Narrative:  PTI Public Status	100	% for this sample	All QA/QC was acceptable.		
DF = Dilution Factor Used  Approved By:			Date: 6/28/95		

Annroved Rv.

Test Method for Dil and Grease and Petroleum Hydrocarbons in Water and Soil \* \* Perkin-Elmer Model 1600 FT-IR Analysis Report 73/03/30 14:25 Sample identification 746835 Initial mass of sample, g 2.020 Volume of sample after extraction, ml 28.000 Petroleum hydrocarbons, ppm 41.817 Net absorbance of hydrocarbons (2930 cm-1) 0.015 ile N  $\cdot k$ 





ATI I.D. 506301

June 8, 1995

El Paso Natural Gas Co. P.O. Box 4990 Farmington, NM 87499

Project Name/Number: PIT CLOSURE 24324

Attention: John Lambdin

On 06/01/95, Analytical Technologies, Inc., (ADHS License No. AZ0015), received a request to analyze non-aqueous samples. samples were analyzed with EPA methodology or equivalent methods. The results of these analyses and the quality control data, which follow each set of analyses, are enclosed.

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Enclosure

H. Mitchell Rubenstein, Ph.D.

Laboratory Manager



#### GAS CHROMATOGRAPHY RESULTS

TEST

: BTEX, MTBE (EPA 8020)

CLIENT

: EL PASO NATURAL GAS CO. ATI I.D.: 506301

PROJECT # : 24324

PROJECT NAME : PIT CLOSURE

SAMPLI ID. #	E CLIENT I.D.	MATRIX	DATE SAMPLED	DATE EXTRACTED	DATE ANALYZED	DIL. FACTOR
ID. #	946835	NON-AQ	05/25/95	06/01/95	06/02/95	1
02	946836	NON-AQ	05/25/95	06/01/95	06/02/95	1
03	946837	NON-AQ	05/25/95	06/01/95	06/02/95	1
PARAM	ETER		UNITS	01	02	03
BENZE			MG/KG	<0.025	<0.025	<0.025
TOLUE			MG/KG	<0.025	<0.025	<0.025
	BENZENE		MG/KG	<0.025	<0.025	<0.025
	XYLENES		MG/KG	<0.025	<0.025	<0.025
	L-t-BUTYL ETHER		MG/KG	<0.12	<0.12	<0.12
	OGATE:			100	92	95
BROMO	FLUOROBENZENE (%)			100		

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